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Thomas L. Mumaw Senior Attorney (602) 250-2052 Direct Line

September 19, 2005

Commissioner William A. Mundell Arizona Corporation Commission 1200 West Washington Phoenix, Arizona 85007-2996

Re:

APS Bill Estimation:

Docket No. E-01345A-03-0437

E-01345A-05-0526

Dear Commissioner Mundell:

This letter will confirm that it is standard Arizona Public Service Company ("APS") practice to provide customers at least as many months to pay an underbilling as the months covered by the underbilling. For purposes of such policy, APS would treat a month in which no bill was issued to the customer as an underbilling month.

I hope this is responsive to your request. Please let me know if you have any other questions concerning APS billing practices.

Sincerely.

Thomas L. Mumaw

Attorney for Arizona Public Service Company

TLM/ Enclosures

CC:

Chairman Jeff Hatch-Miller

Commissioner Mike Gleason Commissioner Marc Spitzer Commissioner Kristin K. Mayes

Parties to the Docket

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